

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Development of Operational, Technical and)	WT Docket No. 96-86
Spectrum Requirements for Meeting Federal,)	
State and Local Public Safety Communications)	
Requirements Through the Year 2010)	
)	
Service Rules for the 698-746,747-762)	WT Docket No. 06-150
and 777-792 MHz Bands)	
)	
Former Nextel Communications, Inc.)	WT Docket No. 06-169
Upper 700 MHz Guard Band)	
Licenses and Revisions to Part 27 of)	
the Commission's Rules)	
)	
Implementing a Nationwide,)	PS Docket No. 06-229
Broadband, Interoperable Public)	
Safety Network in the 700 MHz Band)	

COMMENTS OF THE POLICE EXECUTIVE RESEARCH FORUM

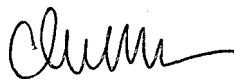
The Police Executive Research Forum (PERF) submits these comments in response to the Commission's *Further Notice of Proposed Rulemaking* in the above-captioned proceedings. PERF is a national membership organization of progressive police executives from the largest city, county and state law enforcement agencies. Ten leaders of large American law enforcement agencies created PERF in 1976 as an institution dedicated to advancing professionalism in policing by fostering research and debate. PERF members lead larger police agencies that collectively serve a majority of the U.S. population. PERF also has levels of membership that include top police officials from smaller jurisdictions, personnel below the rank of chief from all police agencies, researchers and scholars, and others involved in criminal justice. All members must be committed to PERF's founding principles and must possess a four-year college degree from an accredited institution.

PERF concurs with the recommendations regarding this proposal made by the National Public Safety Telecommunications Council (NPSTC), a federation of policing associations and other public safety organizations. NPSTC provides expert analysis of the public safety implications of technical policy questions in telecommunications.

Specifically, PERF joins the NPSTC in its disagreement with the Federal Communications Commission's tentative conclusion that providing flexibility could hinder efforts to deploy a nationwide, interoperable broadband network. It is our understanding that this conclusion would eliminate local and regional decision-making by police and other public safety entities and would prevent them from choosing communications solutions that best fit their requirements. Agencies would need to wait for a nationwide build-out of a broadband network to cover their jurisdictions, which could take up to 10 years. Further, there are many areas in which police might never receive coverage.

It seems to us that providing more choices to police agencies would give us more flexibility as we endeavor to expand our communications capabilities. We urge the Commission to carefully consider the recommendations of the NPSTC and to reconsider the proposal to mandate only one nationwide broadband alternative for all public safety entities across the country.

Respectfully submitted,



Chuck Wexler
Executive Director
Police Executive Research Forum
Washington, D.C.
May 23, 2007